



PALMDALE
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California Energy Commission

DOCKETED

09-RENEW EO-1

TN 74826

FEB 26 2015

February 23, 2015

JAMES C. LEDFORD, JR.
Mayor

MIKE DISPENZA
Mayor Pro Tem

STEVEN D. HOFBAUER
Councilmember

ROXANA MARTINEZ
Councilmember

FREDERICK THOMPSON
Councilmember

California Energy Commission
Dockets Office, MS-4
Docket No. 09-REVIEW E0-01
1516 Ninth Street
Sacramento, CA 95814-5512

**RE: Draft Desert Renewable Energy Conservation Plan and
Environmental Impact Report/Environmental Impact Statement
(DRECP NEPA/CEQA)**

38300 Sierra Highway

To whom it may concern:

Palmdale, CA 93550-4798

Thank you for the opportunity to review and comment on the Draft Desert Renewable Energy Conservation Plan (DRECP) and associated EIR/EIS. The City of Palmdale offers the following comments on the proposal:

Tel: 661/267-5100

Fax: 661/267-5122

The City is opposed to any plan that fails to preserve local land use authority. Existing laws, regulations and policies require that approval of both long range plans and individual projects be consistent with established plans. If adopted, this will include the DRECP as it is both a Habitat Conservation Plan and a Natural Community Conservation Plan. This could potentially require an Environmental Impact Report and Statement of Overriding Considerations for any project processed by the City located within a Development Focus Areas (DFA) that is not associated with renewable energy development.

TDD: 661/267-5167

The DRECP covers significant portions of North Los Angeles County, including areas surrounding the incorporated cities of Palmdale and Lancaster. Much of the land surrounding the urban boundary of the cities of Palmdale and Lancaster, including land between Palmdale/Lancaster and Edwards Air Force Base, are designed as a DFA for renewable energy development. Renewable energy development within the DFA includes potential utility-scale solar, wind power installation and geothermal power generation.

Auxiliary aids provided for

communication accessibility

upon 72 hours notice and request.

The continued operations of military facilities within the high desert area, including Edwards Air Force Base and U.S. Air Force Plant 42, are of vital importance to the City of Palmdale. Any potential use that would impact the viability of operations of either military facility is opposed by the City. This would include the permitting of wind powered installations and solar power tower facilities in areas that could negatively impact military operations areas. Wind turbines have the potential to block radar wave transmission and interfere with Doppler radar, potentially interfering with military missions. Solar power towers have the potential to be an obstruction hazard to aircraft navigation.

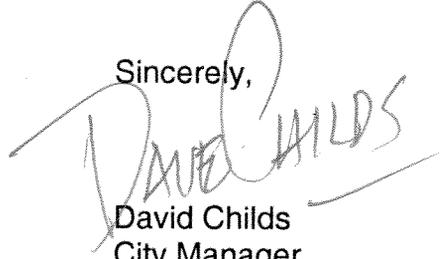
It is of significant concern to the City that the draft plan does not identify U.S. Air Force Plant 42 as a military use within the plan. Plant 42 is a government owned, contractor operated facility which provides significant employment opportunities to residents of the city and surrounding areas. Any use which could potentially impact the viability of operations of Plant 42 is of critical concern to the City and will be strenuously opposed.

The DRECP state that local governments could utilize the plan for developing land use plans or policies or local requirements for renewable energy projects. As stated above, the City of Palmdale will not adopt any plan, and will oppose the adoption of a plan by another local jurisdiction, that would permit that installation of renewable energy developments that could potentially negatively impact the operations of military facilities within the high desert. Mitigation Measure LU-1a, where the applicant must identify how the project would address applicable inconsistencies with local agency plans and policies, does not address the impact of failing to preserving local authorities land use authority and the City strenuously disagrees that the implementation of the proposed mitigation would result in a less than significant impact.

Comments to the California Energy Commission
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If you have any questions regarding this matter, please contact Susan Koleda, AICP, Acting Planning Manager, at (661) 276-5200 or skoleda@cityofpalmdale.org.

Sincerely,

A handwritten signature in black ink that reads "DAVID CHILDS". The signature is written in a cursive style with a large, looping initial "D".

David Childs
City Manager

DC:sk